

**UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF COLUMBIA**

DENICE MORGAN

Plaintiff

v.

Civil Action No.: 05-0967 (RMC)

MICHAEL L. DOMINGUEZ,
Secretary of the Air Force

Defendant.

PLAINTIFF'S CONSENT MOTION FOR ENLARGEMENT OF TIME

Plaintiff, Denice Morgan, by and through undersigned counsel, respectfully moves this Court pursuant to Rule 6(b)(1), Fed. R. Civ. P., to enlarge the time to reply or otherwise respond to Defendant's Motion to Dismiss, or, in the Alternative, for Summary Judgment. Plaintiff requests that the deadline for responding be extended specifically from January 13, 2006 to February 17, 2006. No scheduling order has been entered in this case. Defendant, through counsel, graciously consented to this motion.

This enlargement of time is sought because additional time is needed for counsel for the Plaintiff to discuss key issues of the case with Plaintiff and Co-Counsel.

This extension is sought in good faith and will not unfairly prejudice any party. Allowing Plaintiff some additional time to formulate its response will aid both the parties and the Court in the development and resolution of this case.

The parties agree that no additional requests for enlargement of time will be submitted.

WHEREFORE, based on the foregoing, Plaintiff respectfully requests that the time for answering or otherwise responding to Defendant's Motion to Dismiss, or, in the Alternative, for

Summary Judgment be extended to February 17, 2006.

Dated: January 9, 2006

Respectfully submitted,

DENICE MORGAN
By Counsel

_____/S/
Harvey J. Volzer, DCB 263525
216 South Patrick Street
Alexandria, VA 22314
(703) 549-0446
(703) 549-0449 facsimile
Counsel for Plaintiff

_____/S/
Fred Goldberg, DCB 279893
7101 Wisconsin Avenue, Suite 1201
Bethesda, MD 20814
(301) 654-3300
(301) 654-1109
Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that the foregoing Consent Motion for Enlargement of Time was served upon defendant pursuant to the Court's electronic filing system, addressed to:

Megan Rose
Assistant United States Attorney
Judiciary Center Building, E-4220
Civil Division
555 4th Street, NW
Washington, DC 20530

on this 9th day of January, 2006.

_____/S/
Harvey J. Volzer